

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA,) CR. NO.: 1:06-611 (MBS)
)
vs.) NOTICE OF MOTION & MOTION
)
John Henry Stroman ,)
)
Defendant.)

TO: C. TODD HAGINS, ASSISTANT U.S. ATTORNEY:

PLEASE TAKE NOTICE that the Defendant, John Henry Stroman, will move before the Court, allowing Defendant to be given a copy of the complete discovery and to maintain this discovery himself.

Said motion based upon the fact that Defendant strongly feels that he is entitled to have a copy of the discovery so that he may assist in formulating his defense. Without a copy, he does not have appropriate access , and, therefore, is being denied the right to a fair trial.

Said motion further to be based upon the applicable case law and further evidence to be submitted.

Respectfully submitted,

s/Kenneth M. Mathews
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Columbia, SC
September 25, 2006